

### **REMARKS**

Claims 1-21 are pending in the present application. Claim 1 has been amended. Claim 1 is the sole independent claim. The Examiner is respectfully requested to reconsider his rejections in view of the above amendments and the following remarks.

#### ***Interview on February 7, 2007***

Applicants wish to thank Examiner Chau Nguyen for taking the time to discuss the application with Applicants' representative, Jason Rhodes, during the personal interview conducted on February 7, 2007. The substance of the interview is provided below.

#### **Substance of the Interview**

**Identification of claims discussed:** claim 1.

**Identification of prior art discussed:** U.S. Patent Publication 2003/0023634 to Justice et al. (hereafter "Justice").

**General Thrust of Arguments:** Justice does not add content to a structured document as claimed.

**Identification of Proposed Amendments:** The Examiner and Applicants' representative discussed amendments for claim 1 to clarify the claimed "content."

**General results:** While there was tentative agreement that the proposed claim amendments would distinguish over the Examiner's previous interpretation of Justice, the Examiner said it would be necessary to reevaluate Justice and conduct an update search in view of the proposed amendments.

*Rejection Under 35 U.S.C. § 103*

**Rao/Justice Rejection**

Claims 1-3, 6, 7, and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,581,056 to Rao (hereafter “Rao”) in view of U.S. Patent Application Publication No. 2003/0023634 to Justice et al. (hereafter “Justice”). This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

During the aforementioned interview, the Examiner explained that she was relying on Justice’s indiscriminate markup file to teach the claimed structured document, and on Justice’s discriminate markup file to teach the claimed markup document. In addition, the Examiner stated that she was broadly interpreting the term “content” in claim 1 as reading on the markup tags in Justice’s discriminate markup file.

Applicants do not concede that the Examiner’s interpretation of Justice or the claims is proper. Further, assuming *arguendo* that the Examiner’s interpretations are reasonable, Applicants still do not concede the appropriateness of this rejection. However, in an effort to expedite prosecution, Applicants have amended claim 1 to clarify the claimed “content” and more clearly distinguish over Justice.

As such, claim 1 has been amended to recite that the content, which is added to the structured document to generate the markup document, is different from the markup tags in the markup document. In Justice, when comparing the discriminate markup file (Fig. 3) to the indiscriminate markup file (Fig. 4), it is clear that the only differences between the two documents are in the markup tags. There is no difference in content between Justice’s indiscriminate and discriminate markup file. Thus, it is clear that Justice does not add content to the indiscriminate markup file in order to generate the discriminate markup file.

Furthermore, as admitted by the Examiner in page 3 of the Office Action, Rao does not remedy this deficiency of Justice.

At least for the reasons set forth above, Applicants respectfully submit that independent claim 1 is in condition for allowance. Further, Applicants submit that claims 2, 3, 6, 7, and 17 are allowable at least by virtue of their dependency on an allowable claim. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

### **Other Rejections**

Claims 4 and 8 stand rejected under § 103(a) as being unpatentable over Rao, Justice, and U.S. Patent No. 7,020,685 to Chen et al. (hereafter "Chen").

Claims 5 and 9 stand rejected under § 103(a) as being unpatentable over Rao, Justice, and U.S. Patent No. 5,848,415 to Guck (hereafter "Guck").

Claims 10, 11, 14, 16, and 18-21 stand rejected under § 103 as being unpatentable over Rao, Justice, and U.S. Patent No. 6,748,569 to Brooke et al. (hereafter "Brooke").

Claims 12 and 13 stand rejected under § 103 as being unpatentable over Rao, Justice, Brooke, and U.S. Patent Application Publication No. 2001/0044811 to Ballantyne et al. (hereafter "Ballantyne").

It is respectfully submitted that none of Chen, Guck, Brooke, and Ballantyne remedies the deficiencies of Rao and Justice set forth above in connection with independent claim 1.

### ***Conclusion***

Since the remaining patents cited by the Examiner have not been utilized to reject the claims, but to merely show the state of the art, no comment need be made with respect thereto.

In view of the above amendments and remarks, it is believed that the claims clearly distinguish over the patents relied on by the Examiner, either alone or in combination.

Should the Examiner believe that any outstanding matters remain in the present application, the Examiner is respectfully requested to contact Jason W. Rhodes (Reg. No. 47,305) at the telephone number of the undersigned to discuss the present application in an effort to expedite prosecution.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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